

**UNITED STATES BANKRUPTCY COURT  
EATERN DISTRICT OF PENNSYLVNIA**

<b>IN RE:</b>	:	<b>CHAPTER 13</b>
	:	
<b>RICHARDSON BURGESS</b>	:	
	:	
<b>Debtor</b>	:	<b>BANKRUPTCY NO. 17-12770</b>
	:	
<b>Wilmington Savings Fund Society</b>	:	
<b>Movant</b>	:	

**DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC  
STAY FILED BY WILMINGTON SAVINGS FUND SOCIETY**

NOW COMES RICHARDSON BURGESS, by and through his attorney, Ashley M. Sullivan, Esquire, and hereby files an answer to the Motion for Relief from the Automatic Stay.

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. Movant did not provide any payment history in connection with the alleged delinquency.
7. Denied. Attorney for movant did not provide any evidence of fees and costs incurred for the filing of said motion.
8. Denied. Debtor has sufficient funds to cure any current delinquency.
9. Denied. Debtor has recently made a payment to the Chapter 13 Trustee.
10. Denied. The averments in Paragraph 10 of Movant's Motion are specifically denied and strict proof thereof is demanded.
11. Admitted.
12. Denied. The averments in Paragraph 12 of Movant's Motion are specifically denied and strict proof thereof is demanded.

WHEREFORE, Respondent respectfully requests that Movant's Motion to Relief from the Automatic Stay be denied.

FREEDMAN AND LORRY, P.C.

BY: /s/ Ashley M. Sullivan

ASHLEY M. SULLIVAN, ESQUIRE  
Attorney for Debtor

**CERTIFICATION**

Petitioner certifies under penalty of perjury that the matters stated herein are true and correct to the best of her knowledge, information, and belief.

DATE: August 3, 2018

ATTORNEYS FOR DEBTORS

/s/ Ashley M. Sullivan  
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